

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

PHILIP CALDERON, FARSHAD PINCHASI,
ALLISON FIELDS, and DANA FOLGAR,
*on their own behalf and on behalf of all others
similarly situated,*

Civ. Action No.:
25-cv-02320 (ARR)(MMH)

Plaintiffs,
– *against* –

PUBLIC PARTNERSHIPS, LLC,

Defendant.

-----X

**PLAINTIFFS AND DEFENDANT’S JOINT STIPULATION TO ENLARGE TIME TO
RESPOND TO FIRST AMENDED COMPLAINT AND ANY SUBSEQUENT MOTION
TO DISMISS**

Plaintiffs Philip Calderon, Farshad Pinchasi, Allison Fields, and Dana Folgar, on their own behalf and on behalf of all others similarly situated and Defendant Public Partnerships, LLC, by and through their undersigned counsel, hereby jointly stipulate with Defendant Public Partnerships, LLC as follows:

Whereas, Plaintiffs filed a Complaint against Defendant, Public Partnerships, LLC on April 25, 2025;

Whereas, Plaintiffs filed a First Amended Complaint against Defendant on May 28, 2025;

Whereas, summons was issued on May 30, 2025, and served via the New York Secretary of State pursuant to Fed. R. Civ. P. 4 and N.Y. Limited Liability Company L. § 303 on June 3, 2025, *see* ECF No. 15;

Whereas, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Defendant’s response to the First Amended Complaint is due 21 days after service, on or before June 24, 2025;

Whereas, pursuant to Fed. R. Civ. P. 12(b), Plaintiffs' response to a potential motion to dismiss (in whole or in part) by Defendant would be due 14 days after filing, on or before July 8, 2025 if a motion to dismiss were filed on June 24, 2025;

Whereas, pursuant to this Court's Individual Rule III(A)(i), the undersigned counsel conferred and have jointly stipulated as follows:

- (i) To enlarge Defendant's time to respond to the First Amended Complaint by 45 days, i.e., to August 8, 2025;
- (ii) That Defendant waives any objections to service of process and personal jurisdiction;
- (iii) To enlarge Plaintiffs' time to respond to any potential motion to dismiss made by Defendant's to 41 days, in light of pre-planned vacation schedules, such that Plaintiffs' opposition to any such motion, if one is filed on August 8 would be due September 18, 2025;
- (iv) To enlarge Defendants' time to file a reply to any such opposition to 13 days, such that Defendants' reply brief would be due October 1, 2025; and

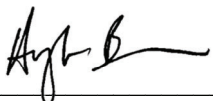
Whereas, the parties have not previously requested a request for extension of these deadlines.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

- Defendant's response to Plaintiffs' First Amended Complaint shall be due on or before August 8, 2025;
- In the event Defendant files a motion to dismiss, Plaintiffs' opposition to that potential motion shall be due 41 days after any such motion is filed, on or before September 18, 2025, and Defendant's reply will be due 13 days after any such opposition is filed, on or before October 1, 2025.

Dated: June 24, 2025
New York, New York

KATZ BANKS KUMIN LLP

By: 

Hugh Baran (he/him)
Emma Walters (she/her)
111 Broadway, Suite 1403
New York, NY 10006
(646) 759-4501
Baran@katzbanks.com
Walters@katzbanks.com

THE LEGAL AID SOCIETY

B. Franco Olshansky
Richard Blum
Rebekah Cook-Mack
Michael Diller
49 Thomas Street, Fl 5
New York, NY 10013
(332) 227-7291
bfrancoolshansky@legal-aid.org
rblum@legal-aid.org
rcook-mack@legal-aid.org
mdiller@legal-aid.org

Counsel for Plaintiffs

PIERSON FERDINAND LLP

By: 

Dan Messeloff
Irene Oria
1468 West 9th Street
Suite 100
Cleveland, OH 44101
dan.messeloff@pierferd.com
irene.oria@pierferd.com

Counsel for Defendant

IT IS SO ORDERED:

Dated: _____

HONORABLE ALLYNE R. ROSS
United States District Court Judge